



**County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

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May 27, 2016

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From: Philip L. Browning
Director

**SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY FISCAL COMPLIANCE ASSESSMENT AND
CONTRACT COMPLIANCE REVIEW**

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Fiscal Compliance Assessment and Contract Compliance Review of Southern California Foster Family Agency (the FFA) in November 2015. The FFA has one office located in the First Supervisorial District and provides services to the County of Los Angeles DCFS placed children. According to the FFA's Program Statement, its stated purpose is "to provide foster and adoptive families who offer stable, secure and nurturing environments to children, who are dependents of the court until they are reunited with their birth families, are adopted, or become independent."

At the time of the review, the FFA served 99 placed children in 126 Certified Foster Homes (CFHs). The placed children's average length of placement was 15 months, and their average age was 4.

SUMMARY

CAD conducted a Fiscal Compliance Assessment which included an agency-wide review of the FFA's financial records such as financial statements, bank statements, check register, and personnel files to determine the FFA's compliance with the terms, conditions and requirements of the Foster Family Agency Contract, the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal, State and County regulations and guidelines.

The FFA was in full compliance with 3 of 5 applicable areas of the Fiscal Compliance Assessment: Loans, Advances and Investments; Board of Directors and Business Influence; and Payroll and Personnel.

CAD noted deficiencies in the areas of Financial Overview, related to the Semi-Annual Expenditure report not timely submitted; and Cash/Expenditures, related to the FFA not having a written agreement for one of the independent contractors.

During CAD's Contract Compliance Review, the interviewed children generally reported: feeling safe at the FFA CFHs; being provided with good care and appropriate services; being comfortable in their placement environment; and being treated with respect and dignity. The Certified Foster Parents (CFPs) reported that they were supported by the FFA staff in their efforts to provide care, supervision, and service delivery to the children placed in their homes.

The FFA was in full compliance with 9 of 11 areas of CAD's Contract Compliance Review: Certified Foster Homes; Facility and Environment; Education and Workforce Readiness; Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; Discharged Children; and Personnel Records.

CAD noted deficiencies in the areas of: Licensure/Contract Requirements, related to a Community Care Licensing (CCL) citation; and Maintenance of Required Documentation and Service Delivery, related to the FFA Social Workers not developing timely, comprehensive Updated Needs and Services Plans (NSPs) with the child's participation.

Attached are the details of CAD's review.

REVIEW OF REPORT

On January 5, 2016, Theodore Howard, DCFS CAD, and Aiyana Rios, DCFS Out-of-Home Care Management Division (OHCMD) held an exit conference with the FFA representatives: Sarah Boone, Chief Executive Officer (CEO); Janet Marinaccio, Chief Operating Officer (COO); Kimberly Sutton, Director of Foster Care; and Amanda Silvers, Foster Care Services Supervisor. On January 20, 2016, Joe Jimenez Jr., DCFS CAD, held the fiscal exit conference with Sarah Boone, CEO, and Janet Marinaccio, COO. The FFA's representatives agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve their compliance with regulatory standards; and agreed to address the noted deficiencies in both a Corrective Action Plan (CAP) and a Fiscal CAP (FCAP).

A copy of this compliance report has been sent to the Auditor-Controller (A-C) and CCL.

The FFA provided the attached approved CAP and FCAP addressing the recommendations noted in this compliance report. The OHCMD provided technical assistance to the FFA on January 12, 2016.

If you have any questions, your staff may contact me or Aldo Marin, Board Relations Manager, at (213) 351-5530.

PLB:KR:LTi:th

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Sarah Boone, CEO, Southern California Foster Family Agency
Lajuannah Hills, Regional Manager, Community Care Licensing Division
Lenora Scott, Regional Manager, Community Care Licensing Division

**SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY
FISCAL COMPLIANCE ASSESSMENT REVIEW
FISCAL YEAR 2015-2016**

SCOPE OF REVIEW

The Fiscal Compliance Assessment included a review of Southern California Foster Family Agency (the FFA's) for the period of January 1, 2014 through August 31, 2015. The Contracts Administration Division (CAD) reviewed the financial statements, bank statements, check register, and personnel files to determine the FFA's compliance with the terms, conditions and requirements of the programs contract with the Auditor-Controller Contract Accounting and Administration Handbook (A-C Handbook) and other applicable federal, State and County regulations and guidelines.

The agency-wide Fiscal Compliance Assessment review focused on five key areas of internal controls:

- Financial Overview,
- Loans, Advances and Investments,
- Board of Directors and Business Influence,
- Cash/Expenditures, and
- Payroll and Personnel.

The FFA was in full compliance with 3 of 5 applicable areas of the Fiscal Compliance Assessment: Loans, Advances and Investments; Board of Directors and Business Influence; and Payroll and Personnel.

FISCAL COMPLIANCE

CAD found the following areas out of compliance:

Financial Overview

- Semi-Annual Expenditure Report (SAER) that was due on September 1, 2015 was not submitted.

After the exit conference, management submitted the SAER on January 25, 2016. Additionally, a Staff Accountant was hired to assure that all future SAERs are submitted timely.

Cash/Expenditures

- No written agreement for one of the independent contractors.

A written contractor agreement was created for the independent contractor. In the future, all independent contractors will have a written agreement.

Recommendations:

The FFA's management shall ensure that:

1. Semi-Annual Expenditure Reports are submitted timely.

2. Contractor agreements are maintained for all independent contractors.

PRIOR YEAR FISCAL COMPLIANCE ASSESSMENT FOLLOW-UP

CAD conducted a Fiscal Compliance Assessment of the FFA in County Fiscal Year 2014-2015. The assessment resulted in five recommendations. CAD verified that 4 of 5 recommendations were implemented. The pending recommendation related to the Semi-Annual Expenditure Reports not being timely submitted.

NEXT FISCAL COMPLIANCE ASSESSMENT

The next Fiscal Compliance Assessment of the FFA will be conducted in County Fiscal Year 2016-2017.

**SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY**

155 N. Occidental Blvd.
Los Angeles, CA 90026
License Number: 191500291

	Contract Compliance Review	Findings: November 2015
I	<u>Licensure/Contract Requirements</u> (7 Elements) <ol style="list-style-type: none"> 1. Timely Notification for Child's Relocation 2. Timely, Cross-Reported SIRs 3. Runaway Procedures in Accordance with the Contract 4. Are there CCL Citations/OHCMD Safety Reports 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA Pays Certified Foster Parents (CFP) Whole Foster Family Home Payments 7. FFA Conducts an Assessment of CFP Prior to Placement of 2 or More Children 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Improvement Needed 5. Not Applicable 6. Not Applicable 7. Full Compliance
II	<u>Certified Foster Homes</u> (12 Elements) <ol style="list-style-type: none"> 1. Home Study and Safety Inspection Conducted Prior to Certification 2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification 3. Timely Criminal Clearances (Federal Bureau of Investigation (FBI) California Department of Justice (DOJ), Child Abuse Central Index (CACI)), Prior to Certification 4. Timely, Completed, Signed Criminal Background Statement 5. Health Screening & TB Test Prior to Certification 6. All Required Training Prior to Certification 7. Certificate of Approval on File/Including Capacity 8. Safety Inspection Completed At Least Every Six Months or Per Approved Program Statement 9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates 10. Current Driver's License/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers 11. Criminal Clearances and Health Screening/Driver's License /CPR/FBI/DOJ/CACI/Auto Insurance for Other Adults in the Home 12. FFA Assists CFPs in Providing Transportation Needs 	<p style="text-align: center;">Full Compliance (All)</p>

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III	<u>Facility and Environment</u> (7 Elements) <ol style="list-style-type: none"> 1. Exterior/Grounds Well Maintained 2. Common Areas Well Maintained 3. Children's Bedrooms/Interior Well Maintained 4. Sufficient and Appropriate Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. CFP Conducted Disaster Drills and Documentation Maintained 7. Money and Clothing Allowance Logs Maintained 	Full Compliance (All)
IV	<u>Maintenance of Required Documentation and Service Delivery</u> (10 Elements) <ol style="list-style-type: none"> 1. FFA Obtains or Documents Efforts to Obtain DCFS Children's Social Worker's (CSW's) Authorization to Implement NSPs 2. CFPs Participated in Development of the NSPs 3. Children Progressing Towards Meeting NSP Goals 4. FFA Social Workers Develop Timely, Comprehensive Initial NSP with the Child's Participation 5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with the Child's Participation 6. Therapeutic Services Received 7. Recommended Assessments/Evaluations Implemented 8. DCFS Children's Social Worker's Monthly Contacts Documented in Child's Case File 9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports 10. FFA Social Workers Conduct Required Visits 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Improvement Needed 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance
V	<u>Education and Workforce Readiness</u> (5 Elements) <ol style="list-style-type: none"> 1. Children Enrolled in School Within Three School Days 2. Children Attend School as Required and FFA Facilitates in Meeting Children's Educational Goals 3. Current Children's Report Cards/Progress Reports Maintained 4. Children's Academic Performance and/or Attendance Increased 5. FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs 	Full Compliance (All)

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VI	<u>Health and Medical Needs</u> (4 Elements) 1. Initial Medical Exams Conducted Timely 2. Follow-Up Medical Exams Conducted Timely 3. Initial Dental Exams Conducted Timely 4. Follow-Up Dental Exams Conducted Timely	Full Compliance (All)
VII	<u>Psychotropic Medication</u> (2 Elements) 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review	Full Compliance (All)
VIII	<u>Personal Rights and Social/Emotional Well-Being</u> (10 Elements) 1. Children Informed of Agency's Policies and Procedures 2. Children Feel Safe in the CFP Home 3. CFPs' Efforts to Provide Nutritious Meals and Snacks 4. CFPs Treat Children with Respect and Dignity 5. Children Allowed Private Visits, Calls and to Receive Correspondence 6. Children Free to Attend or Not Attend Religious Services/Activities of Their Choices 7. Children's Chores Reasonable 8. Children Informed About Their Medication and Right to Refuse Medication 9. Children Aware of Right to Refuse or Receive Medical, Dental and Psychiatric Care 10. Children Given Opportunities to Participate in Extracurricular Activities, Enrichment and Social Activities at the CFH, School, and Community	Full Compliance (All)
IX	<u>Personal Needs/Survival and Economic Well-Being</u> (7 Elements) 1. Clothing Allowance Provided in Accordance with FFA Program Statement 2. Ongoing Clothing Inventories of Adequate Quantity and Quality 3. Children Involved in the Selection of Their Clothing 4. Provision of Sufficient Supply of Clean Towels and Personal Care Items Meeting Ethnic Needs 5. Minimum Weekly Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement and Assistance with a Life Book or Photo Album	Full Compliance (All)

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X	<u>Discharged Children</u> (3 Elements) <ol style="list-style-type: none">1. Completed Discharge Summary2. Attempts to Stabilize Children's Placement3. Child Completed High School (if applicable)	Full Compliance (All)
XI	<u>Personnel Records</u> (9 Elements) <ol style="list-style-type: none">1. Criminal Clearances (FBI, DOJ, CACI) Signed and Submitted Timely2. Timely, Completed, Signed Criminal Background Statement3. FFA Social Workers Met Education/Experience Requirements4. Timely Employee Health Screening/TB Clearances5. Valid Driver's License and Auto Insurance6. FFA Employees Signed Copies of FFA Policies and Procedures7. FFA Employees Completed All Required Training and Documentation Maintained8. FFA Social Workers Have Appropriate Caseload Ratio9. FFA Maintained Written Declarations for Part-Time Contracted FFA Social Workers Caseloads Not to Exceed a Total of 15 Children	Full Compliance (All)

**SOUTHERN CALIFORNIA FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2015-2016**

SCOPE OF REVIEW

The following report is based on a "point in time" review. This compliance report addresses findings noted during the November 2015 review. The purpose of this review was to assess Southern California Foster Family Agency's (the FFA's) compliance with the County contract and State regulations and included a review of the FFA's Program Statement, as well as administrative internal policies and procedures. The compliance review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- Facility and Environment,
- Maintenance of Required Documentation and Service Delivery,
- Education and Workforce Readiness,
- Health and Medical Needs,
- Psychotropic Medication,
- Personal Rights and Social/Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children, and
- Personnel Records.

For purposes of this review, 10 placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed eight children, as two children were either pre-verbal or too young to be interviewed. During the home visits, the children were observed to be comfortable and well cared for in the Certified Foster Homes (CFHs), and their Certified Foster Parents (CFPs) were observed to be responsive to the needs of the children. CAD reviewed 10 case files to assess the level of care and services the children received. Additionally, three discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, two children were prescribed psychotropic medication. These case files were reviewed to assess for timeliness of Psychotropic Medication Authorizations and to confirm the required documentation of psychiatric monitoring.

CAD reviewed five CFP files and five staff files for compliance with Title 22 Regulations and County contract requirements. Site visits were conducted to the FFA and the CFHs to assess the quality of care and supervision provided to the placed children.

CONTRACTUAL COMPLIANCE

CAD found the following two areas out of compliance:

Licensure/Contract Requirements

- Community Care Licensing (CCL) citations.

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CCL cited the FFA for a complaint received by CCL on January 5, 2015 and substantiated a neglect/lack of supervision, stating an infant was not taken for medical care. The FFA disputed the citation on June 19, 2015, providing documentation the infant was taken for several medical visits prior to and after the CCL citation. CCL's Plan of Correction (POC) required the FFA to provide additional training to the CFP. An investigation was completed by the Out-of-Home Care Investigations Section (OHCIS) where allegations of general neglect were determined to be unfounded.

Recommendation:

The FFA's management shall ensure that:

1. The FFA is in compliance with Title 22 Regulations and free of CCL citations.

Maintenance of Required Documentation and Service Delivery

- FFA Social Workers did not develop timely, comprehensive Updated Needs and Services Plans (NSPs) with the child's participation.

For 1 of 17 NSPs reviewed, the NSP was not timely. The NSP was due on February 4, 2015, but was signed by the child and CFP on February 23, 2015. No documentation was provided explaining why the signatures were late.

Recommendation:

The FFA's management shall ensure that:

2. FFA Social Workers develop timely, comprehensive Updated NSPs with the child's participation.

PRIOR YEAR FOLLOW-UP FROM DEPARTMENT OF CHILDREN & FAMILY SERVICES
CAD'S FFA CONTRACT COMPLIANCE REVIEW

The CAD's last compliance report dated October 2, 2015, identified five recommendations.

Results:

Based on CAD's follow-up, the FFA implemented 4 of 5 previous recommendations for which they were to ensure that:

- Special Incident Reports (SIRs) are cross-reported.
- Money and clothing allowance logs are maintained.
- FFA Social Workers develop timely Initial NSPs with the child's participation.
- FFA Social Workers develop timely quarterly reports.

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Based on CAD's follow-up, the FFA did not implement 1 of 5 prior recommendations for which they were to ensure that:

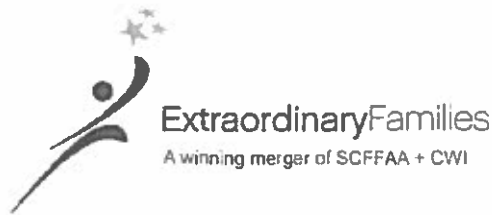
- FFA Social Workers develop timely Updated NSPs with the child's participation.

Recommendation:

The FFA's management shall ensure that:

3. The outstanding recommendation from the prior report noted in this report as Recommendation Number 2, is fully implemented.

At the exit conference, the FFA representatives expressed their desire to remain in compliance with Title 22 Regulations and Contract requirements. The FFA will consult with the Out-of-Home Care Management Division for additional support and technical assistance, and CAD will continue to assess implementation of the recommendations during its next review.



Board of Directors

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March 1, 2016

Los Angeles County Department of Children and Family Services
Contract Administration Division
3530 Wilshire Blvd., 4th floor
Los Angeles, CA 90010

Dear Mr. Howard,

ExtraordinaryFamilies submits the following Corrective Action Plan (CAP) to address the areas identified as needing improvement in the Foster Family Agency Monitoring Review Field Exit Summary dated February 5, 2016. We would like to thank you for your comprehensive review.

Licensure/Contract Requirements:

Finding: **ExtraordinaryFamilies** had one substantiated Community Care Licensing complaint on safety and physical plant deficiencies since the last review.

ExtraordinaryFamilies Response: The agency had one substantiated complaint since the last review: CCL received a complaint on 1-5-15 and issued a substantiated report on 6-9-15. In this investigation, CCL concluded that the child, age 3, did not receive timely medical attention to address what was diagnosed as a diaper rash at the time the child was placed with the family. While the foster family sought medical attention on three occasions within 13 days and followed all physicians' instructions regarding medical treatment, CCL believed this was insufficient because the child's rash had not responded to the prescribed treatment and was still present.

ExtraordinaryFamilies has filed an appeal with the assigned CCL Supervising LPA, outlining in detail the reasons that the agency is in disagreement with CCL's findings. In this particular case, only CCL conducted a formal investigation. A Special Incident Report was submitted to DCFS, and there was no DCFS inquiry, and therefore no DCFS finding or plan of correction regarding the incident. DCFS was satisfied with the foster parents provision of medical attention and the subsequent compliance with the physician's instructions regarding medical care and follow up for the rash.

While **ExtraordinaryFamilies** awaits the outcome of the appeal, we have completed the required plan of correction with the family, which involved providing training regarding the provision of timely medical attention. Since 1-5-15, there have been no substantiated Community Care Licensing complaints.

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Mr. Howard
Dept of Children & Family Services
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Maintenance of Required Documentation and Service Delivery:

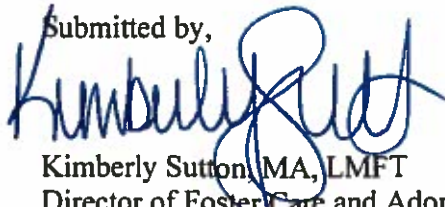
Finding: For one of the ten children included in the review, the NSP was not signed by the youth or foster parent until 19 days after the NSP due date.

Extraordinary Families Response: Extraordinary Families places great importance on using a teamwork approach in developing NSP reports in a timely manner. The one missing signature identified in this review represents an oversight, not a pattern. Out of ten youth chosen for the review, each of which included multiple NSP reports, there was just one report that was signed approximately two weeks after the report was due. This report had been completed and submitted to DCFS on time; however, the FFA worker neglected to present the report to the foster parent and youth on or before the report's due date, as required by contract.

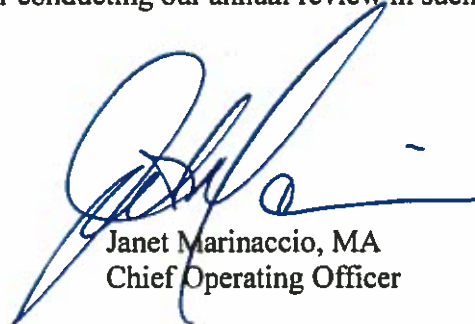
Throughout the review process, agency expectations to complete NSP reports and obtain required signatures was in accordance with the agency's DCFS contract. In order to improve our performance in this area, Director of Foster Care and Adoption, Kimberly Sutton, conducted a training for all staff foster care social workers on 2-17-16, reviewing requirements and due dates for obtaining NSP signatures.

Extraordinary Families would like to thank DCFS for the feedback received in this review. We are proud of the work we do to meet the needs of children and families served by our agency. Our long track record of success represents evidence of our high standards of quality practice. We appreciate the opportunity to implement continuous improvements. We found the review process to be supportive and collaborative, and our foster parents who were part of the review expressed having felt appreciated and respected. We would like to thank you for conducting our annual review in such a professional manner.

Submitted by,



Kimberly Sutton, MA, LMFT
Director of Foster Care and Adoption



Janet Marinaccio, MA
Chief Operating Officer

cc: Sarah Boone, CEO